

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LAKEISHA D. WASHINGTON,

Plaintiff,

v.

Case No. 4:22-cv-03680

CASTLE CREDIT CO HOLDINGS, LLC
AND JOHN DOES 1-10,

Defendant.

REQUEST FOR ENTRY OF CLERK'S DEFAULT

NOW COMES Plaintiff, LAKEISHA D. WASHINGTON, and pursuant to Fed. R. Civ. P. 55(a), seeking entry of Clerk's default against Defendant, CASTLE CREDIT CO HOLDINGS, LLC, and in support thereof, stating as follows:

1. On October 25, 2022, Plaintiff filed the instant action against Castle Credit Co Holdings, LLC ("Defendant") seeking redress for violations of the of Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227 *et seq.*, Texas Debt Collection Act ("TDCA"), Tex. Fin. Code Ann. §392 *et seq.*, invasion of privacy, trespass to chattels, and intentional/negligent infliction of emotional distress [Dkt. 1]

2. Plaintiff's claims arise from Defendant's abusive debt collection practices.

3. On November 16, 2022, Defendant was served with Plaintiff's complaint. [Dkt. 10]

4. Defendant's answer was due on or before December 7, 2022.

5. Despite being duly served with Plaintiff's complaint, Defendant has failed to appear or otherwise respond to Plaintiff's complaint.

6. Pursuant to Fed. R. Civ. P. 55(a), Plaintiff is seeking the entry of Clerk's default as a result of Defendant's failure to respond to Plaintiff's complaint.

WHEREFORE, Plaintiff respectfully request the entry of Clerk's default against Defendant Castle Credit Co Holdings, LLC, and for any further relief the Court deems just and proper.

DATED: December 15, 2022

Respectfully submitted,

LAKEISHA WASHINGTON

By: /s/ Marwan R. Daher
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2022, I electronically filed the foregoing with the Clerk of the Court for the Western District of Texas by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing document by USPS Priority Mail, postage prepaid to the following participants:

Castle Credit Co. Holdings, LLC
C/O Registered Agent Corporate Creations Network
350S Northwest HWY #300
Park Ridge, IL 60068

/s/ Marwan R. Daher